

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ATLAS PARTNERS, LLC, f/k/a CROWN	:	
PARTNERS, LLC,	:	
	:	
Plaintiff,	:	14 Civ. 7134 (VM) (FM)
	:	
v.	:	
	:	
STMICROELECTRONICS INTERNATIONAL	:	<b>NOTICE OF MOTION</b>
N.V.,	:	
	:	<b>ORAL ARGUMENT REQUESTED</b>
Defendant.	:	
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PLEASE TAKE NOTICE that, upon the accompanying declaration of Benjamin F. Burry, dated November 20, 2014, and the exhibits attached thereto, the accompanying memorandum of law in support of this motion, and any other submissions that shall be made in support of this motion, the undersigned counsel, on behalf of Defendant STMicroelectronics International N.V. (“ST”), will move this Court, before the Honorable Victor Marrero, at the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, to dismiss the Amended Complaint, in its entirety and with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Rule 6.1(b), Plaintiff shall file its opposition to this motion within fourteen (14) days after service of the moving papers, and ST shall file its reply brief in further support of this motion within seven (7) days after service of Plaintiff’s answering papers.

Dated: New York, New York  
November 20, 2014

Respectfully submitted,

SIDLEY AUSTIN LLP

By: /s/ Benjamin F. Burry  
John J. Kuster  
Benjamin F. Burry

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